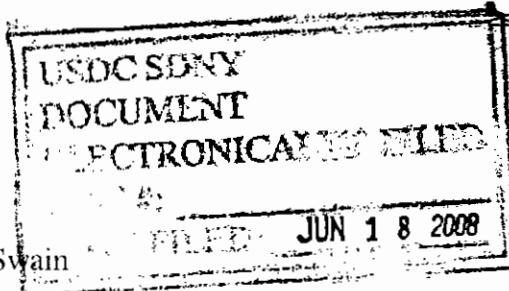


HURWITZ STAMPUR & ROTH
ATTORNEYS AT LAW

MICHAEL HURWITZ
WILLIAM J. STAMPUR
JAMES ROTH

June 16, 2008

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



39 BROADWAY, SUITE 800
NEW YORK, N.Y. 10007

(212) 619-4240
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MEMO ENDORSED

Re: United States vs. Ivan Coss
INF. 08 CR 411 (LTS)

Dear Judge Swain,

The defendant requests a bail modification allowing him to travel in the 48 continental states with condition of prior itinerary notification to the Government and Pretrial Services. Mr. Coss at times needs to travel to other states for business purposes: he is a member of the band. Individual requests for approval may cause delays in his travel plans which can result in increased costs and his inability to travel with his band.

AUSA Daniel Levy and Pretrial Officer Tom Marino consent to this request.

Sincerely,


Michael Hurwitz

cc. Pretrial Officer Tom Marino (By Fax: 212-805-4175)
AUSA Dan Levy (By Fax: 212-637-2429)

The request is granted.

MH:jy

SO ORDERED.


LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE
6/17/08

